

September 29, 2006

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

**Re: Ex Parte Comments of NAMM, the International Music Products Association
Unlicensed Operation in the TV Bands
ET Docket No. 04-186**

Dear Ms. Dortch:

On behalf of the more than 7,700 retailers and manufacturers of musical instruments and electronics that the International Music Products Association ("NAMM") represents, I am writing to express concern regarding the Commission's plan to adopt technical rules for unlicensed devices that will operate in the broadcasting "white spaces" pursuant to ET Docket No. 04-186.

NAMM is the leading voice for the global music products industry and the sponsor of North America's two largest music products trade shows. NAMM is also an important supporter of music education in American schools and communities. As the leading representative of the music product industry, NAMM is acutely aware of the critical role that microphones play in the creation, performance, and distribution of music.

It is NAMM's sincere belief that introducing unlicensed devices into the "white spaces" without meaningful technical protections and certification procedures will result in significant harmful interference for the broadcasters, musicians and performance artists that have relied on wireless microphones and complementary equipment in these same frequencies for decades. As NAMM has expressed to the Commission before, wireless microphones could be rendered virtually unusable if new rules are implemented without providing adequate protection. In its Comments filed earlier in this docket, NAMM pointed out the necessity of developing interference solutions that address the various contexts in which wireless microphones are used today, *i.e.*, studio and stage productions,



live public performances, large musical shows, and sporting events to name a few. It remains critical for the Commission to study thoroughly the full range of potential interference mitigation solutions, including appropriate combinations of solutions, for incorporation into the proposed rules in order to ensure that wireless microphones can continue to operate in the “white spaces” interference free.

In addition to spectrum sensing techniques referred to in the Commission’s recent Public Notice in this docket, the Commission should consider and seek input on other measures that may be necessary to provide meaningful protection to wireless microphones such as spectrum reserves and control channel systems that would transmit occupied channel information in order to protect large events.

Sincerely,



Joe Lamond

President and CEO

